REMARKS/ARGUMENTS

Claims 1-30 are pending in the application. Claims 1, 11, and 21 have been amended merely to clarify certain terms. Reconsideration is respectfully requested. Applicant submits that the pending claims 1-30 are patentable over the art of record and allowance is respectfully requested of claims 1-30.

Claims 1-30 are rejected under 35 U.S.C. 102(a) as being anticipated by Charles G. Call (U.S. Pub. No. 2002/0165707). Applicants respectfully traverse, but, in order to expedite prosecution, Applicants are amending the claims to clarify certain terms.

Anticipation requires that the identical invention must be shown in a single reference in as complete detail as is contained in the claims. Richardson v. Suzuki Motor Co., 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Applicants respectfully submit that the identical invention claimed is not shown in the Call patent application.

Amended claims 1, 11, and 21 describe receiving a token and determining whether a data field associated with the token is a fixed width or a variable width, wherein the data field is fixed width for storing document content and variable width for storing document metadata (e.g., Specification, page 8, paragraph 23; pages 9-10, paragraph 30). When the data field is a fixed width, the token is designated as one for which fixed width sort is to be performed. When the data field is a variable length, the token is designated as one for which a variable width sort is to be performed.

The Examiner refers to paragraph 103 of the Call patent application as teaching determining whether a data field associated with the token is a fixed width. Paragraph 103 describes that as RAM memory costs continue to be reduced, a larger 32 bit integer size could be substituted for the 16 bit integer size. Thus, the Call patent application describes using either the 16 bit integer size or the 32 bit integer size. However, regardless of the size used, there is no teaching of determining whether a data field associated with the token is a fixed width.

Additionally, to expedite prosecution, Applicants are amending claims 1, 11, and 21 to indicate determining whether a data field associated with the token is a fixed width or a variable width, wherein the data field is fixed width for storing document content and variable width for storing document metadata. Applicants submit that the Call patent application does not describe

that the data field is fixed width for storing document content and variable width for storing document metadata.

The Examiner refers to paragraphs 10, 26, 69, and 103 of the Call patent application as teaching when the data field is a fixed width, designating the token as one for which fixed width sort is to be performed. Applicants respectfully traverse. Paragraph 10 of the Call patent application indicates that it is a further object of the invention to *store variable length character data in an addressable array of integer values* organized to permit more efficient execution of processing functions of the type typically performed by data processors. Paragraph 26 of the Call patent application describes that the apparatus and methods *represent natural language text in more compact form as an array of fixed length binary integers* that may be more rapidly searched, sorted and processed. Paragraph 69 describes that text represented by a sequence of one or more integers may be rapidly sorted. Paragraph 103 describes that as RAM memory costs continue to be reduced, a larger 32 bit integer size could be substituted for the 16 bit integer size. However, Applicants submit that the Call patent application represents text as an array of fixed length binary integers and performs a single sort and that there is no need in the Call patent application for the claimed fixed width sort and variable width sort.

The Examiner refers to paragraphs 10,103, and 123 as teaching when the data field is a variable length, designating the token as one for which a variable width sort is to be performed. Applicants respectfully traverse. Paragraphs 10 and 103 were discussed above. Paragraph 123 describes selecting a sequence of integers in the integer array, and these integers are converted into corresponding natural language text. Applicants respectfully submit that *conversion of integers to text does not anticipate, when the data field is a variable length, designating the token as one for which a variable width sort is to be performed*.

Thus, the Call patent application does not anticipate claims 1, 11, and 21.

Dependent claims 2-10, 12-20, and 22-30 incorporate the language of independent claims 1, 11, and 21 and add additional novel elements. Therefore, dependent claims 2-10, 12-20, and 22-30 are not anticipated by the Call patent application for at least the same reasons as were discussed with respect to claims 1, 11, and 21.

Conclusion

For all the above reasons, Applicant submits that the pending claims 1-30 are patentable over the art of record. Applicants have not added any claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0460.

The attorney of record invites the Examiner to contact her at (310) 553-7973 if the Examiner believes such contact would advance the prosecution of the case.

Dated: February 12, 2007   By:___/Janaki K. Davda/_____

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